## REMARKS

Claims 1 to 52 were pending in the application at the time of examination. Claims 1 to 52 stand rejected as anticipated.

Prior to considering the rejection, Applicants note that a copy of the priority document on which the instant Application claims priority was sent to the USPTO, and a date stamped return receipt postcard was received acknowledging receipt of the priority document. However, the Office Action Summary fails to acknowledge the priority claim. Applicants respectfully request that the Examiner acknowledge the priority claim and receipt of the priority document.

Also, the Examiner relies upon U.S. Patent No. 6,615,212 to Dutta et al. in the anticipation rejection. However, Dutta was not cited on PTO-892. Applicants respectfully request that the Examiner cite the reference on a PTO-892. Further, Applicants were not provided with a copy of the Non-Patent Document cited on the PTO-892 and respectfully request issuance of a copy by the USPTO.

Claims 1 to 36 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,615,212 to Dutta et al., hereinafter referred to as Dutta. With respect to the rejection of Claim 1, the Examiner cited Col. 2, lines 41 to 47 and 53 to 55 as teaching the elements of Claim 1.

Applicants respectively traverse the anticipation rejection of Claim 1. Claim 1 recites in part:

     a proxy server . . . .; and

     a processing server . . .

The portion of Dutta cited by the Examiner described a single server, "a transcoding proxy server." Dutta clearly describes in this section that the operations are performed on a single server.

For an anticipation rejection, the MPEP requires:

TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY
ELEMENT OF THE CLAIM

"A claim is anticipated only if each and every
element as set forth in the claim is found, either
expressly or inherently described, in a single prior art
reference." . . . . "The identical invention must be
shown in as complete detail as is contained in the ...
claim." . . . . The elements must be arranged as required by
the claim, but this is not an *ipsissimis verbis* test,
i.e., identity of terminology is not required.

MPEP § 2131, 8th Ed., Rev. 2, P. 2100-73 (May, 2004).

Since the Examiner has cited only a "a transcoding proxy
server," the rejection fails to demonstrate that Dutta shows
"The identical invention . . . in as complete detail as is
contained in the ... claim." Therefore, according to the MPEP,
Dutta fails to anticipate Claim 1. Applicants request
reconsideration and withdrawal of the anticipation rejection of
Claim 1.

Claims 2 to 9 depend from Claim 1. Therefore, each of
Claims 2 to 9 distinguishes over Dutta for at least the same
reasons as Claim 1. Applicants respectfully request
reconsideration and withdrawal of the anticipation rejection of
each of Claims 2 to 9.

With respect to Claims 10 to 20, the Examiner stated:

Regarding claims 10-20, have similar limitations as claims
1-9. Therefore, claims 17-32 are rejected for the same
reasons set forth in the rejection of claims 1-9.

Applicants have assumed the "17-32" is an error, and
should be "10-20." Applicants respectfully traverse the
anticipation rejection of Claim 10. Claim 10 recites in part:

generating a rendering request for transmission to a
processing server . . .;

> generating rendered data by rendering data at the
> processing server

As noted above with respect to Claim 1 and incorporated
herein by reference, the Examiner has cited only a "transcoding
proxy server" in Dutta.  The Examiner has failed to cite the
generation of a rendering request, or generating rendered data
at the processing server.  As noted above, and incorporated
herein by reference, Dutta teaches away from such a combination
by teaching only the "transcoding proxy server" cited by the
Examiner.  Applicants request reconsideration and withdrawal of
the anticipation rejection of Claim 10.

Claims 11 to 34 depend from Claim 10.  Therefore, each of
Claims 11 to 34 distinguishes over Dutta for at least the same
reasons as Claim 10.  Applicants respectfully request
reconsideration and withdrawal of the anticipation rejection of
each of Claims 11 to 34.

In the anticipation rejection of Claim 35, the Examiner
stated in part:

> receiving a message at a processing server to render data
> requested by a client (Duta [Sic], col.5, 1.50-53);

Dutta stated at this location:

> ing content; client 408 supports a Scalable Vector
> Graphics (SVG) format for sending and receiving content;
> and client 410 supports a Wireless Markup Language (WML)
> format for sending and receiving content.  Furthermore,
> each origin-

This section teaches nothing about a message, a processing
server, or rendering data.  The fact that a client can send and
receive data in a particular format fails to teach anything
about this element of Claim 35.

Next, the Examiner stated:

> retrieving the requested data from an intermediate data
> store (Dutta, col.6, l.58-60);

Dutta stated at this location:

> That is to say, the transcoding proxy server may transfer
> to the client any of the intermediate outputs and the
> associated content analyzer to the client.

Transferring intermediate outputs to the client fails to teach
or suggest anything concerning retrieving data.

Either of these distinctions is sufficient to overcome the
anticipation rejection in view of the above quotation from the
MPEP. Applicants respectfully request reconsideration and
withdrawal of the anticipation rejection of Claim 35.

Claims 36 to 38 depend from Claim 35. Therefore, each of
Claims 36 to 38 distinguishes over Dutta for at least the same
reasons as Claim 35. Applicants respectfully request
reconsideration and withdrawal of the anticipation rejection of
each of Claims 36 to 38.

In the anticipation rejection of Claim 39, the Examiner
quoted the claim language and cited Dutta, Col. 3, lines 31 to
53. This portion of Dutta describes a distributed data
processing system. This section does not include any
description of "a proxy server" or "a processing server."
Therefore, again based upon the quotation from the MPEP, this
section of Dutta fails to anticipate Claim 39. Applicants
request reconsideration and withdrawal of the anticipation
rejection of Claim 39.

Claim 39 also stands rejected for the same reasons as set
forth in the rejection of Claims 10 to 22. Applicant
respectfully notes that the limitations in Claim 10 and in
Claim 39 are different. For example, Claim 39 does not include
"generating a rendering request." Therefore, the rejection
itself demonstrates that Dutta fails to teach exactly what is

claimed. Applicants request reconsideration and withdrawal of the anticipation rejection of Claim 39.

In the anticipation rejection of Claim 40, the Examiner quoted the claim language and cited Dutta, Col. 4, lines 1 to 67 and Col. 5, lines 1 to 19.

Lines 1 to 24 of Col. 4 describe Fig. 2 that is a block diagram of "a data processing system which may be implemented as a server, such as server 104 in FIG. 1, and utilized as a transcoding proxy server or originating server, is depicted in accordance with the present invention."

Col. 4 lines 25 to Col. 5, line 19 describe "With reference now to FIG. 3, a block diagram of a data processing system in which the present invention may be implemented is illustrated. Data processing system 300 is an example of a client computer."

Thus, according to the rejection, both a server and a client system are needed to anticipate the proxy server of Claim 40. This is clear error. The Examiner has failed to cite with specificity any teaching, for example, of

> authorize a processing server to retrieve and render the requested data in accordance with the determination of the proxy server, and to transmit the rendered data to the client

Therefore, Dutta fails to meet the requirements of the MPEP quoted above. Applicants request reconsideration and withdrawal of the anticipation rejection of Claim 40.

Claims 41 to 52 depend from Claim 40. Therefore, each of Claims 41 to 52 distinguishes over Dutta for at least the same reasons as Claim 40. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of each of Claims 41 to 52.

Claims 1 to 52 remain in the application. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions

relating to the above, the Examiner is respectfully requested
to telephone the undersigned Attorney for Applicant(s).

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the
United States Postal Service with sufficient postage as first class mail
in an envelope addressed to: Commissioner for Patents, P.O. Box
1450, Alexandria, VA 22313-1450, on February 10, 2005.

_____ February 10, 2005
Attorney for Applicant(s)              Date of Signature

Respectfully submitted,

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